UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

THE ESTATE (SUCCESSION) OF DORIS IGOIN, LAURENCE APFELBAUM, individually and in her capacities as executor and beneficiary of the Estate (Succession) of Doris Igoin, and EMILIE APFELBAUM,

Defendants.

Adv. Pro. No. 10-04336 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including September 29, 2016.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York August 18, 2016

By: /s/ Ona T. Wang

Baker & Hostetler LLP 45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan

e-mail: dsheehan@bakerlaw.com

Tracy Cole

e-mail: tcole@bakerlaw.com

Ona T. Wang

e-mail: owang@bakerlaw.com

M. Elizabeth Howe

e-mail: bhowe@bakerlaw.com

David M. McMillan

e-mail: dmcmillan@bakerlaw.com

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate

of Bernard L. Madoff

By: /s/ Ted A. Berkowitz. Farrell Fritz, P.C.

622 Third Avenue

37th Floor

New York, New York 10017

(212) 808-7800

Ted A. Berkowitz

Mediator in Picard v. The Estate (Succession) of Doris Igoin, Laurence

Apfelbaum and Emilie Apfelbaum

By: /s/ Jonathan K. Cooperman Kelley Drye & Warren LLP

101 Park Avenue

New York, New York 10178

(212) 808-7800

Jonathan K. Cooperman

Attorneys for Defendants The Estate (Succession) of Doris Igoin, Laurence Apfelbaum and Emilie Apfelbaum